

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD/SN)
---	----------------------

This document relates to: *Estate of John P. O'Neill, Sr., et al. v. The Republic of Iraq, et al.*,  
04-cv-1076 (GBD)(SN)

**DECLARATION OF JERRY S. GOLDMAN, ESQ. IN SUPPORT OF MOTION TO ADD  
ONE ADDITIONAL PLAINTIFF AGAINST THE TALIBAN**

I, Jerry S. Goldman, Esq., declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. I am a shareholder at Anderson Kill P.C., attorneys for Plaintiffs in the above-captioned action. I am familiar with the facts and circumstances of this case and am admitted to practice in this Court.

2. Undersigned counsel seeks to add one additional plaintiff, Maribeth Eccleston, a sibling of 9/11 victim Terrance A. McShane,<sup>1</sup> to the above-referenced case, solely against the Taliban, who was inadvertently excluded from the prior Motion to Add Additional Plaintiffs Against the Taliban, ECF No. 8106.

3. On June 14, 2022, undersigned counsel filed a Motion to Add Additional Plaintiffs Against the Taliban, ECF No. 8106. On June 15, 2022, Your Honor granted the Motion, ECF No. 8111. On June 16, 2022, undersigned counsel filed a Second Amended Complaint against the Taliban, adding seventy-one (71) additional plaintiffs to the case. ECF No. 8115.

---

<sup>1</sup> Undersigned counsel also represents the estate representative, spouse, and children of 9/11 victim Terrance A. McShane, who are already plaintiffs with claims against the Taliban.

4. At the time of these filings, undersigned counsel believed this to be a complete and final list of clients who needed to be added to suit against the Taliban.

5. On June 21, 2022, I was informed that one additional person, Maribeth Eccleston, had engaged Anderson Kill P.C. prior to filing the June 14, 2022 Motion to Add Additional Plaintiffs Against the Taliban. The signed engagement letter was provided to a staff member for processing, but due to the timing of her vacation schedule, she did not process the engagement letter until her return on June 21, 2022.

6. While undersigned counsel had taken numerous precautions to ensure that incoming engagement letters were processed immediately on receipt (as demonstrated by the engagement letters received and processed on June 14, 2022 from four additional clients and who were then added to the prior motion to add parties the same day, ECF No. 8105) and to account for vacation schedules, this engagement letter was not processed until June 21, 2022.

7. Undersigned counsel has since personally confirmed with all staff members who process engagement letters that no other signed 9/11 engagement letters were received prior to the filing of the Motion to Add Additional Plaintiffs Against the Taliban, ECF No. 8106.

8. Attached hereto as Exhibit A is a true and correct copy of the Proposed Third Amended First Consolidated Complaint with the additional plaintiff added.

9. Undersigned counsel envisions that the above-referenced plaintiff will be included in the Framework Agreement previously described to the Court. *See* ECF No. 7790.

WHEREFORE, plaintiff respectfully requests that the Court grant this Motion to Add One Additional Plaintiff Against the Taliban.

Dated: June 27, 2022  
New York, NY

/s/ Jerry S. Goldman

---

Jerry S. Goldman, Esq.  
Anderson Kill P.C.  
1251 Avenue of the Americas  
New York, NY 10020  
Email: [jgoldman@andersonkill.com](mailto:jgoldman@andersonkill.com)  
Tel: 212-278-1000  
Fax: 212-278-1733